

SECTION 2

2.1 STAFFING GRANT GUIDANCE

This guidance consolidates information on the following subjects related to the staffing grants:

- A. Eligibility criteria to seek 100 percent funding for a county's first position as part of SWRM grant application.
- B. Recognition of role of LCC in overseeing grant funds.
- C. Changes in reimbursement procedures for staffing grants.
- D. Clarification of funds that can be used to meet match requirements.
- E. Changes in the reimbursement of support costs.
- F. Special procedures for counties awarded cooperator and NMFE grants.
- G. Procedures for requesting re-allocation or redirection of staff grant funds.

A. Staffing grant eligibility criteria

DATCP uses two-tiered approach to award annual staffing allocations. Tier 1 awards each county \$75,000 as a basic award. Tier 2 attempts to provide counties with funding to pay for three positions based on actual costs of those positions at the rate of 100 percent for the first position, 70 percent for the second, and 50 percent for the third position.

In 2015, the Tier 2 formula was modified for the first time since its inception in 2006 to strengthen the conservation focus of county programs. DATCP sought to accomplish this goal by limiting 100 percent funding for county's first position to department heads or technicians only if they perform conservation work as their full-time responsibilities.

For the 2016 and future allocations, DATCP may further modify the staffing grant formula to better achieve a conservation focus. DATCP will announce any new criteria in the grant application instructions for the applicable grant year. Among other actions, DATCP plans to more clearly define qualifying conservation activities for determining whether a staff person may be claimed as a first position. Before pursuing other changes, DATCP will take into account reductions or increases in amounts annually appropriated for staffing grants.

B. LCC oversight responsibilities

County Land Conservation Committees (LCC) or appropriate county board committees are required under s. ATCP 50.10, Wis. Admin. Code and Ch. 92, Stats to oversee local administration of SWRM grant funds from authorizing county requests for funding to approving expenditures of grant funds.

In rule and policy, DATCP is taking steps to ensure that LCCs are functioning as required as required by state law. The 2014 revision to ATCP 50, for example, clarified that each county LCC must approve the terms of a DATCP grant contract or amendment before the document is signed by an authorized county representative. s. ATCP 50.36 (1). DATCP

may request that a county provide proof that the person signing the document is properly authorized.

C. Changes in reimbursement procedures

In recent years, SWRM program staff has focused on measures to streamline the grant processes, with a special emphasis on electronic submission of documents. Here are some key improvements:

1. Elimination of the requirement that the Chief Financial Officer (CFO) sign the staffing grant reimbursement request form. [Sees. ATCP 50.32 (7) (b)]. Counties can now submit reimbursement request signed by an authorized county representative without the need for the CFO to also sign the form.
2. Increased reliance of scanning and electronic submission of required documents. We have included staffing reimbursement requests among the documents that should be electronically submitted. When documents are electronically submitted, counties should retain the originals of documents and forms submitted to DATCP for a minimum of 3 years after the end of the year of the grant award. Longer retention periods may apply if the documents are covered by the requirements related to annual staffing grants [s. ATCP 50.32 (9)], or related to cost-share grants [s.ATCP 50.34 (7)]

D. Clarification of match requirements

In completing their staff and support reimbursement requests, counties are responsible for ensuring that they have met the match requirement for all positions where a match is required. Currently no match is required for a county's first position which DATCP funds at 100 percent, but is required for all other positions for which a county seeks reimbursement. Sec.s. ATCP 50.32 (7) (c) 4. clarifies that counties can use various funding sources to meet their match requirement, including county levy, permit fees, private grants, federal grants, state funds other than those under chs. 92, 281 and 283, Stats.

E. Changes in reimbursement of support costs

Beginning 2014, counties may not obtain more 10 percent of their annual grant award as reimbursement for support costs such as such as training. [Revised s. ATCP 50.32 (5) (b)]. DATCP's reimbursement request forms incorporate this cap.

In addition, counties may only claim training-related reimbursement for registration, fees, travel, and materials related to (a) training in conservation planning and management, technical standards implementation, clerical assistance, computer usage, and communications; (b) courses building skills to perform current responsibilities or develop professionally in the field of soil and water management, and (c) other training costs identified in the grant application for the grant year in which the funds are to be expended. s. ATCP 50.32 (3m)

F. Special procedures for counties awarded cooperator and Nutrient Management Farmer Education (NMFE) grants

Added in 2014, s. ATCP 50.35 established procedures to solicit and award grants under s. 92.14(10), Stats., and specifically recognized counties could apply for and receive cooperator and NMFE grants if counties kept these grants separate their SWRM staffing and support grants. DATCP has revised its grant contracts, as well as related forms, to ensure that county recipients (a) use cooperator or NMFE grant funds only for work related to the project, and not for any work the county is authorized to perform under the basic staffing grant awarded as part of SWRM grant program, and (b) adopt internal procedures to prevent them from seeking reimbursement for SWRM work under a cooperator or NMFE grant.

Unlike staffing grants awarded to counties, counties are eligible to extend unspent cooperator and NMFE grant funds for one year.

G. Procedures for re-allocation and redirection of staffing grant funds

With DATCP approval, counties may have options to use staffing grants for other purposes. While no special form is required to make these requests, there are specific procedures that apply for re-allocation and redirection of staffing grant funds.

1. **Re-allocation** from county LCC to another agency or entity in the county under s. ATCP 50.32(1)
 - i. Counties can only request re-allocation of staffing grant funds to a city, town, village, tribe, county drainage board or another agency operating in the county.
 - ii. Re-allocated staff funds can only be used to pay for work performed within the county.
 - iii. The county must submit a written request to DATCP and receive written permission to re-allocate any funds.
 - iv. The request must specify the total amount of re-allocation.
 - v. The request must identify specific activities in the county's LWRM plan that will be performed by the entity receiving the re-allocation. DATCP recommends that counties provide a copy of the work plan with the specific activities clearly identified.
 - vi. The request must be received no later than October 1, of the calendar year of the grant.
 - vii. DATCP will approve a maximum amount to be re-allocated, which will enable a county to spend any unused portion of the re-allocation to cover its own staff costs.
 - viii. Even though re-allocated funds can only be used to pay for work or activities performed during the grant year, they cannot be used to pay for work or activities performed prior to the date DATCP grants permission for the re-allocation. Re-allocated funds can be used to pay for support item costs in accordance withs. ATCP 50.32(4).

- ix. When counties seek reimbursement for work performed by an entity using re-allocated county staffing grants funds, the county must list the name of each staff person performing the work and the rate of reimbursement sought. On their request form, counties must select only one person (including county employees) for positions entitled reimbursement at the 100 or 70 percent rates. The county must provide the appropriate match for all persons listed except the first position.
- x. Re-allocated funds cannot be used to meet county matching requirements for other state or federal programs.
- xi. The county must submit and certify reimbursement requests for work or activities performed by the entity authorized to receive re-allocated funds.
- xii. DATCP will reimburse counties which assume responsibility for transferring funds to entities authorized to receive re-allocated funds.
- xiii. As part of its annual report for the year in which the funds were re-allocated, the county will need to provide a description of the activities performed by the entity with the re-allocated funds.

2. **Redirection** from county staffing grant funds to cost-share funds under s. ATCP 50.32(11)

- i. No county can submit a request for redirection unless it first submits a staffing grant reimbursement request on or after July 1 for costs incurred before July 1.
- ii. The county must submit a written request to DATCP no later than October 1st and receive written permission to redirect any funds.
- iii. The request must specify the total amount of redirection.
- iv. Redirected funds cannot be used to pay for cost-shared practices installed before DATCP granted permission for the redirection.
- v. Redirected funds cannot be used to pay for cost-share contracts executed before DATCP granted permission for the redirection.
- vi. If DATCP permission is granted, the county's grant contract with DATCP must be amended to reflect the redirection of funds. The revised contract would include a provision that redirected funds would not be eligible for extension.
- vii. Redirected funds are not eligible to be transferred to another county.